

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)U.S. Postal Service Priority Mail Express parcel EJ 630
657 605 US addressed to "Madison T Bobrow, 1 League,
PO Box 64107, Irvine, CA 92602"

Case No.

2:21-mj-330

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 U.S.C. Section 841(a)(1)	Possession with intent to distribute a controlled substance
21 U.S.C. Section 843(b)	Prohibited use of a communication center (U.S. Mail)
21 U.S.C. Section 846	Attempt and conspiracy

The application is based on these facts:

See attached Affidavit

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Sworn to before me and signed in my presence.

Date:

5-12-21

City and state: Columbus, OH

Applicant's signature

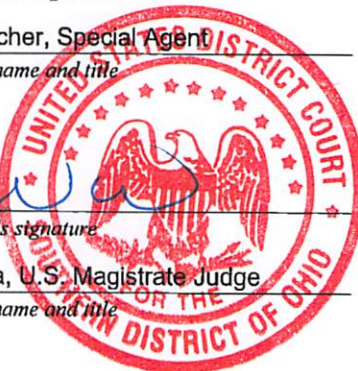
Dustin Rambacher, Special Agent

Printed name and title

Judge's signature

Chelsey M. Vascara, U.S. Magistrate Judge

Printed name and title



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

IN THE MATTER OF THE SEARCH OF
U.S. POSTAL SERVICE PRIORITY MAIL
EXPRESS PARCEL EJ 630 657 605 US
ADDRESSED TO "MADISON T
BOBROW, 1 LEAGUE, PO BOX 64107,
IRVINE, CA 92602"

Case No. _____

AFFIDAVIT IN SUPPORT OF
APPLICATION FOR SEARCH WARRANT

I, Dustin L. Rambacher, being duly sworn, deposes and states the following:

1. I am a Special Agent for the U.S. Postal Service Office of Inspector General (USPS OIG) assigned to conduct general investigations of USPS employees and the abuse of U.S. Mail. I have been a USPS OIG Special Agent since 2011. During this time, I have been assigned to conduct investigations of narcotics and internal mail theft, investigating the mailing of illegal narcotics, their proceeds, and the theft, rifling, destruction, mistreatment, willful delay, or tampering of the U.S. Mail. I have training and experience in the enforcement of laws in the United States, including training on how to conduct drug related investigations, search and seizure laws, evidence handling and processing, and drug identification and field testing. I am a graduate of the Criminal Investigator Training Program at the Federal Law Enforcement Training Center at Glynco, Georgia. I have a Bachelor's degree in criminal justice from the University of Mount Union and a Master's degree in criminal justice from the University of Cincinnati.

2. This Affidavit is made in support of a search warrant for the following property, namely a package associated with U.S. Postal Service Priority Mail Express parcel, tracking number EJ 630 657 605 US, as further described in Attachment A. This affidavit is made in support of a warrant to search the package for evidence of a crime as well as contraband, fruits of a crime,

or other items illegally possessed in relation to the following offenses: Title 21 United States Code (USC) Section 841(a)(1) – Possession with intent to distribute a controlled substance, Title 21 USC Section 843(b) – Prohibited use of a communication center (U.S. Mail), and Title 21 USC Section 846 – Attempt and conspiracy.

3. The information in this affidavit is based on personal knowledge and information provided to me by other law enforcement officers and individuals. The information in this affidavit is provided for the limited purpose of establishing probable cause. The information is not a complete statement of all facts related to this case.

4. On January 20, 2021, the affiant conducted a pro-active review of possible narcotics parcels inbound to Central Ohio. The affiant reviewed a USPS OIG domestic parcel report and identified a pattern of parcels destined for address 675 Hazel Bark Drive, Newark, OH 43055. Postal Service records showed that from October 2020 to January 2021, at least nine parcels were mailed from California and/or bearing addresses in California to 675 Hazel Bark Drive, Newark, OH 43055. According to shipping data, the parcels were addressed to Zack Campbell, Andie Campbell, Omar Lopez, and Oscar Cruz.

5. The affiant conducted a review of law enforcement databases to determine if the addressee names were legitimate. Law enforcement databases returned that similar names Izaac Campbell and Andrea Campbell were associated with 675 Hazel Bark Drive, however there were no names associated with the address that were similar to Omar Lopez or Oscar Cruz.

6. The affiant knows from training and experience that sometimes drug traffickers will use fictitious addressee names on parcels to separate themselves from illegal drug shipments.

7. The affiant also conducted further reviews of other parcels associated with the 675 Hazel Bark Drive parcels. The affiant identified several Priority Mail Express parcels that had been

mailed from Newark, OH to California, and specifically Irvine, CA, around the time in which the parcels matching the pattern were mailed to 675 Hazel Bark Drive.

8. The affiant knows from training and experience that California is a source state for illegal drug shipments into Central Ohio. The affiant knows from training and experience that drug traffickers who mail illegal drugs have also been known to receive cash shipments for payment in return, going back to that same origin area.

9. On March 17, 2021, the affiant received an automated Postal Service parcel data report which detailed inbound parcels. In review of the report, the affiant identified inbound U.S. Postal Service Priority Mail parcel 9405 5368 9523 2729 7563 59, addressed to "Zack Cambell, 675 Hazel Bark Dr, Newark, OH 43055-7380," which was mailed from California on March 16, 2021. After the affiant intercepted the parcel later that week, a federal search warrant was sought for the parcel. Upon approval and execution of the search warrant, it was determined that the parcel contained various vacuum sealed plastic bags with various containers of unknown substances and liquids. Some of the containers inside the parcel were labelled "crunchy chocolate canna nugs" and "1000mg THC." Laboratory testing is pending for the items seized from the parcel, however the contents appeared similar to that of marijuana-related products/edibles that the affiant has identified in other investigations. The affiant knows from training and experience that people who use or traffic marijuana have been known to use the terms "nugs" and "THC" to describe marijuana or marijuana-related products.

10. On April 19, 2021, the affiant was contacted by Central Ohio Drug Enforcement (CODE) Task Force Detective Justin Woodyard regarding the investigation. Detective Woodyard advised the affiant that earlier that day, he observed someone matching Izaak Campbell's

description leaving the Newark, OH Post Office. Detective Woodyard advised that it appeared the individual had possible paperwork or a receipt in their hand as they departed.

11. Later on April 19, 2021, the affiant reported out to the Newark, OH Post Office. In reviewing surveillance video from that post office, the affiant observed a person matching the description that Detective Woodyard provided mailing a parcel out from the retail window. The affiant identified and intercepted U.S. Postal Service Priority Mail Express parcel EJ 630 656 848 US, which was addressed to "Madison T Bobrow, 1 League, PO Box 64107, Irvine, CA 92602." The parcel was addressed from "Isiah Campbell, 675 Hazel Bark Dr." The parcel was mailed with \$74.85 in postage and weighed approximately 4 lbs. 7 oz. The return street address on the parcel, 675 Hazel Bark Drive, was the same street address where the suspected marijuana-related products were being mailed to, and seized in transit, in March 2021. A review of law enforcement databases returned that there was a "Madison Taylor Bobrow" associated with Irvine, CA. The affiant was unable to positively identify an association between Bobrow and PO Box 64107, Irvine, CA 92602.

12. The affiant applied for and was granted a federal search warrant for Priority Mail Express parcel EJ 630 656 848 US. On April 20, 2021, the affiant executed the search warrant for the parcel. The parcel contained miscellaneous packaging materials and \$6,760 in U.S. currency.

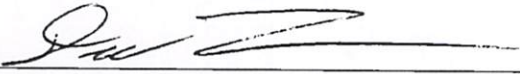
13. On May 11, 2021, the affiant developed information indicating a Priority Mail Express parcel was mailed from the Newark, OH Post Office that was possibly associated with this investigation. In review of the parcels mailed that day, the affiant identified U.S. Postal Service Priority Mail Express parcel EJ 630 657 605 US, addressed to "Madison T Bobrow, 1 League, PO Box 64107, Irvine, CA 92602" (TARGET PARCEL). The affiant noticed that TARGET PARCEL is addressed to the same address as the previously seized money parcel. The return address on TARGET PARCEL is "Eljah Johnson, 104 Hoover St, Newark, OH 43055." According to law

enforcement databases, a person named "Eljah Johnson" could not be associated with address 104 Hoover St, Newark, OH 43055.

14. Later on May 11, 2021, the affiant contacted CODE Task Force Detective Sergeant Adam Hoskinson to obtain a K-9 to conduct a parcel lineup, to include TARGET PARCEL. Detective Sergeant Hoskinson is the handler for K-9 "Buckeye," a drug detection dog most recently certified by the Ohio Peace Officers Training Commission for the detection of the odor of Marijuana, Cocaine, Heroin, and Methamphetamine and their derivatives. K-9 "Buckeye" was re-certified in January 2021.

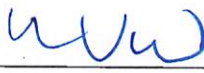
15. TARGET PARCEL was placed in a lineup among other boxes varying in size, and K-9 "Buckeye" was allowed to search the entire area. Detective Sergeant Hoskinson concluded that K-9 "Buckeye" did alert positively to TARGET PARCEL. Based on that alert, Detective Sergeant Hoskinson concluded that the odor of one of the drugs that K-9 "Buckeye" is trained and certified to detect was present in TARGET PARCEL.

16. Based on the foregoing facts, probable cause exists to believe that TARGET PARCEL, U.S. Postal Service Priority Mail Express parcel EJ 630 657 605 US addressed to "Madison T Bobrow, 1 League, PO Box 64107, Irvine, CA 92602," contains evidence associated with violations of Title 21, United States Code, Sections 841(a)(1), 843(b) and 846. I respectfully request the Court to find probable cause to issue a search warrant to search the parcel described in Attachment A for the items listed in Attachment B.



Dustin L. Rambacher
Special Agent
U.S. Postal Service
Office of Inspector General

Sworn and subscribed before me this 12 day of May 2021.



Chelsey M. Vascara
U.S. Magistrate Judge

Attachment A

U.S. Postal Service Priority Mail Express parcel EJ 630 657 605 US addressed to
“Madison T Bobrow, 1 League, PO Box 64107, Irvine, CA 92602”

Attachment B

Any controlled substances, contraband, fruits of the crime, attribution documents, notes, records, and/or currency related to illegal drug trafficking, which constitute evidence of violations of Title 21, United States Code, Sections 841(a)(1), 843(b) and 846.